

Exhibit F

1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

4 UNITED STATES, et al.,

5 Plaintiffs,

6 -against-

7 GOOGLE LLC,

8 Defendant.

9 No: 1:23-cv-00108-LMB-JFA

10
11 September 28, 2023

12 10:04 a.m.

13
14
15
16 DEPOSITION of SIMON WHITCOMBE,
17 taken by Defendant, pursuant to Notice,
18 held at the offices of COVINGTON & BURLING
19 LLP, 620 Eighth Avenue, New York, New York
20 before Wayne Hock, a Notary Public of the
21 State of New York.

22
23
24
25 Job No. CS6114685

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1 S. Whitcombe
 2 is we compete with programmatic, but
 3 generally speaking, particularly on
 4 lower funnel which is the majority of
 5 the revenue that we generate from
 6 advertising at Meta, we perform more
 7 competitively than programmatic
 8 generally. And again, when
 9 advertisers allocate budget on
 10 performance, you know, we do very well
 11 generally versus programmatic. And
 12 that's why you see in a lot of these
 13 documents the search and YouTube and
 14 maybe Tik Tok, that's an area on upper
 15 funnel and lower funnel where we're
 16 not consistently performing better.
 17 It's -- it may be we'll change
 18 depending on an advertiser or the way
 19 that they think about measurement or
 20 -- it's a much less cut and dry.
 21 Q. But just for publisher ad
 22 servers specifically, you almost never
 23 hear that Meta's owned and operated
 24 properties are competing with publishers'
 25 ad servers; correct?

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1 S. Whitcombe
 2 MR. BITTON: Objection to form.
 3 Lacks foundation. Vague. Outside the
 4 scope.
 5 [REDACTED]
 6 [REDACTED]
 7 Q. Let me you ask a little bit
 8 about DSPs or demand side platforms.
 9 Does that make sense?
 10 A. Yes.
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 MR. BITTON: Objection to form.
 15 Lacks foundation.
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 Q. Fair to say that, in your job as

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1 S. Whitcombe
 2 an advertising sales leader for Facebook,
 3 you've never had to educate yourself about
 4 DSPs in detail; is that correct?
 5 A. That's correct.
 6 MR. BITTON: Objection to form.
 7 Leading.
 8 Q. Can you identify any DSPs other
 9 than The Trade Desk?
 10 A. No.
 11 Q. Have you ever heard of
 12 MediaMath?
 13 A. Oh, yeah, I've heard of
 14 MediaMath, yeah.
 15 Q. Is MediaMath a DSP?
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 Q. Have you ever heard that an
 22 advertiser is switching budgets between
 23 MediaMath and Meta?
 24 MR. BITTON: Objection to form.
 25 [REDACTED]

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1 S. Whitcombe
 2 Q. Were you aware that MediaMath
 3 went bankrupt in June of 2023?
 4 MR. BITTON: Objection to form.
 5 THE WITNESS: I do recall
 6 reading about MediaMath going out of
 7 business, yes.
 8 Q. Can you identify any specific
 9 impact that MediaMath's bankruptcy had on
 10 Meta's advertising business?
 11 MR. BITTON: Objection to form.
 12 Lacks foundation.
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 Q. What impact did -- if any, did
 22 MediaMath's bankruptcy have on Meta's
 23 advertising business?
 24 MR. BITTON: Objection to form.
 25 Asked and answered. Lacks foundation.

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1 S. Whitcombe
 2 MS. PATCHEN: Objection. Asked
 3 and answered.
 4 [REDACTED]
 5 [REDACTED]
 6 Q. Have you ever heard of The Trade
 7 Desk's OpenPath product?
 8 A. No.
 9 Q. What impact, if any, did The
 10 Trade Desk launching OpenPath have on
 11 Meta's advertising business?
 12 MR. BITTON: Objection to form.
 13 Lacks foundation.
 14 MS. PATCHEN: Objection. Same.
 15 [REDACTED]
 16 [REDACTED]
 17 Q. Are you familiar with Yahoo's
 18 Gemini ad network?
 19 A. No.
 20 Q. Were you aware that Yahoo has
 21 announced that it was shutting down the
 22 Gemini network?
 23 A. I was not aware.
 24 MR. BITTON: Objection to form.
 25 Lacks foundation.

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1 S. Whitcombe
 2 Q. What impact, if any, is Yahoo's
 3 -- does Yahoo's announcement that it is
 4 shutting down the Gemini ad network have
 5 on Meta's advertising business?
 6 MR. BITTON: Objection to form.
 7 Lacks foundation. Leading.
 8 MS. PATCHEN: Objection. Same.
 9 [REDACTED]
 10 [REDACTED]
 11 Q. Yahoo also recently announced
 12 that it's closing its exchange.
 13 Do you know that?
 14 MR. BITTON: Objection to form.
 15 Lacks foundation.
 16 THE WITNESS: I did not know
 17 that.
 18 Q. What impact, if any, did Yahoo
 19 closing its exchange have on Meta's
 20 advertising business?
 21 MR. BITTON: Objection to form.
 22 Lacks foundation.
 23 MS. PATCHEN: Objection. Same.
 24 [REDACTED]
 25 [REDACTED]

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1 S. Whitcombe
 2 Q. You're aware that some exchanges
 3 have lowered their take rates in recent
 4 years?
 5 MR. BITTON: Objection to form.
 6 Lacks foundation.
 7 [REDACTED]
 8 Q. When exchanges lowered their
 9 take rates in recent years, did that
 10 affect the price of ads sold on Meta's
 11 platform?
 12 MR. BITTON: Objection to
 13 fortunately. Lacks foundation.
 14 MS. PATCHEN: Objection. Same.
 15 MR. BITTON: Leading.
 16 [REDACTED]
 17 [REDACTED]
 18 Q. Can you identify any specific
 19 advertisers who moved some or all of their
 20 budgets from Meta to exchanges when
 21 exchanges lowered their take rates?
 22 MR. BITTON: Objection to form.
 23 Lacks foundation. Leading.
 24 [REDACTED]
 25 [REDACTED]

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1 [REDACTED]
 2 [REDACTED]
 3 Q. Fair to say that, as a sales
 4 leader for Meta's advertising business,
 5 you haven't felt the need to educate
 6 yourself about how exchanges work; is that
 7 correct?
 8 MR. BITTON: Objection to form.
 9 MS. PATCHEN: Objection.
 10 Is he testifying as the
 11 corporate representative now or in his
 12 personal capacity?
 13 MR. VERNON: Both.
 14 MR. BITTON: Objection to form.
 15 Lacks foundation. Outside the scope.
 16 Leading.
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 Q. You were aware that some
6 exchanges will do deals with particular
7 publishers or advertisers under which the
8 exchange agrees to lower its take rate for
9 that particular publisher or advertiser?
10 [REDACTED]
11 MR. BITTON: Objection to form.
12 Lacks foundation. Leading.
13 Q. Can you identify any specific
14 advertisers who moved some or all of their
15 advertising budgets to Meta -- I'm sorry,
16 from Meta to exchanges because exchanges
17 lowered their take rates or a specific
18 publisher or advertiser?
19 MR. BITTON: Objection to form.
20 Lacks foundation. Leading.
21 [REDACTED]
22 Q. What impact, if any, has
23 exchanges lowering their take rates for
24 specific publishers or advertisers had on
25 Meta's advertising business?

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1 S. Whitcombe
2 MR. BITTON: Objection to form.
3 Lacks foundation. Leading.
4 [REDACTED]
5 [REDACTED]
6 Q. Is it fair to say that you are
7 not in a good position to testify based on
8 personal knowledge about whether
9 advertisers would switch between Meta and
10 exchanges if exchanges change their take
11 rates?
12 MR. BITTON: Objection to form.
13 Lacks foundation. Calls for
14 speculation. Leading.
15 MS. PATCHEN: Objection.
16 THE WITNESS: Can you repeat the
17 question?
18 Q. Sure.
19 Is it fair to say that you're
20 not in a good position to testify based on
21 personal knowledge about whether
22 advertisers would switch between Meta and
23 exchanges if exchanges change their take
24 rates?
25 MR. BITTON: Objection to form.

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1 S. Whitcombe
2 Lacks foundation. Calls for
3 speculation. Leading.
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 Q. So I guess it would be fair to
19 say that you're not in a good position to
20 testify based on personal knowledge about
21 whether advertisers would or would not
22 switch between Meta and exchanges if
23 exchanges change their take rate; is that
24 fair?
25 MR. BITTON: Objection to form.

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1 S. Whitcombe
2 Leading. Calls for speculation.
3 Lacks foundation.
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 MR. BITTON: Objection to form.
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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8 MR. BITTON: Objection.
 9 Mischaracterizes the testimony. Lacks
 10 foundation. Leading.

13 Q. Have you heard of header
 14 bidding?

15 A. I've heard of it. I don't have
 16 a deep understanding of it, no.

17 Q. What impact, if any, did header
 18 bidding have on Meta's advertising
 19 business?

20 MR. BITTON: Objection to form.
 21 Lacks foundation. Leading.

24 Q. Will have you ever heard of
 25 Google's Open Bidding?

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1 S. Whitcombe
 2 A. I have not.
 3 Q. What impact, if any, did Google
 4 launching Open Bidding have on Meta's
 5 advertising business?

6 MS. PATCHEN: Objection. Calls
 7 for speculation.

8 MR. BITTON: Objection to form.
 9 Lacks foundation.

10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

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12 MR. BITTON: Objection to form.
 13 Leading. Mischaracterizes the
 14 testimony. Lacks foundation.

18 Q. Okay.
 19 In the last few years, open
 20 auction display advertising has shifted
 21 from a second price auction to a first
 22 price auction.

23 Are you aware of that?

24 MR. BITTON: Objection to form.
 25 Leading. Lacks foundation.

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1 S. Whitcombe
 2 THE WITNESS: No, I'm not aware
 3 of that.
 4 Q. What impact, if any, did open
 5 auction display's shift from a second
 6 price auction to a first price auction
 7 have on Meta's advertising business?

8 MS. PATCHEN: Objection. Calls
 9 for speculation.

10 MR. BITTON: Objection to form.
 11 Lacks foundation. Leading.

17 Q. Is it fair to say that changes
 18 in how competition works in open auction
 19 display don't, based upon what you hear,
 20 have a significant impact on Meta's
 21 advertising business?

22 MR. BITTON: Objection to form.
 23 Lacks foundation. Mischaracterizes
 24 the testimony. Leading.

25 THE WITNESS: Could you say that

<p style="text-align: right;">Page 206</p> <p>1 S. Whitcombe</p> <p>2 one more time, I'm sorry?</p> <p>3 Q. Sure.</p> <p>4 Is it fair to say that, just</p> <p>5 based on what you hear in your job, that</p> <p>6 changes in how competition works in open</p> <p>7 auction display do not have a significant</p> <p>8 impact on Meta's advertising business?</p> <p>9 MR. BITTON: Objection to form.</p> <p>10 Lacks foundation. Leading.</p> <p>11 Mischaracterizes the testimony.</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 Q. Let me switch topics a little</p> <p>15 bit. Your counsel may object, so I'm</p> <p>16 going to try to do this slowly.</p> <p>17 It's fair to say you're aware,</p> <p>18 just as an individual in the world, there</p> <p>19 is antitrust scrutiny over Meta; is that</p> <p>20 fair?</p> <p>21 MR. BITTON: Objection to form.</p> <p>22 MS. PATCHEN: Objection. Outside</p> <p>23 the scope.</p> <p>24 MR. BITTON: Outside the scope.</p> <p>25 Leading. Lacks foundation.</p>	<p style="text-align: right;">Page 208</p> <p>1 S. Whitcombe</p> <p>2 objection, outside the scope of the</p> <p>3 30(b)(6) topics. Leading. Calls for</p> <p>4 speculation. Calls for legal</p> <p>5 opinions. And lacks foundation.</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 MR. BITTON: Sorry, counsel,</p> <p>13 you're referring to tab fourteen.</p> <p>14 What does that mean?</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>
<p style="text-align: right;">Page 207</p> <p>1 S. Whitcombe</p> <p>2 [REDACTED]</p> <p>3 Q. And it's fair to say that if you</p> <p>4 were to say that display and social are</p> <p>5 separate markets, that would be against</p> <p>6 Facebook's interest with respect to</p> <p>7 antitrust litigation investigations</p> <p>8 relating to Facebook?</p> <p>9 MS. PATCHEN: Objection. Outside</p> <p>10 the scope and calls for speculation.</p> <p>11 MR. BITTON: Objection to form.</p> <p>12 Lacks foundation. Calls for a legal</p> <p>13 conclusion and opinion. Outside the</p> <p>14 scope. Leading.</p> <p>15 THE WITNESS: Sorry, could you</p> <p>16 repeat the question?</p> <p>17 Q. It's fair to say that if you</p> <p>18 were to say that display and social were</p> <p>19 separate markets, that would be against</p> <p>20 Facebook's interests with respect to the</p> <p>21 antitrust scrutiny of Facebook?</p> <p>22 MS. PATCHEN: Same objections.</p> <p>23 This is far outside the scope of the</p> <p>24 questions.</p> <p>25 MR. BITTON: I'll state</p>	<p style="text-align: right;">Page 209</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 MR. BITTON: Yeah, I'll state the</p> <p>14 same objection.</p> <p>15 And counsel, I'm warning you now</p> <p>16 because you're literally taking more</p> <p>17 time than you were allocated to cover</p> <p>18 deposition topics that were already</p> <p>19 covered in a prior deposition, so</p> <p>20 that's in contrast to court orders.</p> <p>21 MR. VERNON: We'll be brief.</p> <p>22 THE WITNESS: (Reviewing).</p> <p>23 Which page especially again?</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

Google's Errata Sheet for Google's Counsel's Questions in the

Transcript of the 30(b)(6) Deposition of Meta Platforms, Inc. (Simon Whitcombe) (September 28, 2023)

Page	Line	Now Reads	Should Read	Reason
9	10-11	other of half	other half	Transcription error
20	11	offer customers	offer its advertiser customers	Transcription error
21	9	advertising spaces	advertising space	Transcription error
24	6	users that Meta serves	users does Meta serve	Transcription error
26	3	the owned	its owned	Transcription error
28	18-19	app element	ad element	Transcription error
33	6-7	based on newspaper websites	placed on newspaper websites	Transcription error
38	5	advertiser counts	advertiser accounts	Transcription error
47	24	[REDACTED]	[REDACTED]	[REDACTED]
52	6-7	gross the business	grows the business	Transcription error
69	3	[REDACTED]	[REDACTED]	[REDACTED]
71	12	[REDACTED]	[REDACTED]	[REDACTED]
74	6	[REDACTED]	[REDACTED]	[REDACTED]
98	9	or	for	Transcription error
214	3	provider programmatic	providers of programmatic	Transcription error
229	7	[REDACTED]	[REDACTED]	[REDACTED]
230	8	[REDACTED]	[REDACTED]	[REDACTED]
235	10-11	[REDACTED]	[REDACTED]	[REDACTED]
241	18	[REDACTED]	[REDACTED]	[REDACTED] error

I have read the transcript of the 30(b)(6) deposition of Meta Platforms, Inc. for which Simon Whitcombe was the designated witness, and have listed all changes and corrections to my questions above, along with my reasons therefore.

Date: 11/1/2023

Signature: 